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9/11/06

IN The UNITED STATES
DISTRICT COURT for The STATE OF DELAWARE
A

Michael Lee Rose

Plaintiff



MOTION FOR
APPOINTMENT OF
COUNSEL

Scanned- 9/13/06

~~XXXX XXXXX~~

Frist Correctional Medical
Correctional Medical Services

Dr. Niaz

Medical Providers

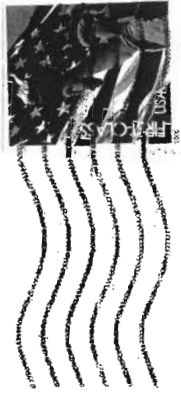
Civil Action No

06-370-JJF

Pursuant to 28 U.S.C. § 1915 moves for an
order appointing counsel to represent him
in this case. In support of this motion plaintiff
states:

1. Plaintiff is unable to afford counsel
 2. Plaintiff's imprisonment will greatly limit his
ability to litigate. The issues involved in this
case are complex and will require significant
research and investigation. Plaintiff has limited
knowledge of the law.
 3. A trial in this case will likely involve conflicting
testimony. Counsel would better enable plaintiff
to present and cross examine witnesses.
 4. All Plaintiff ask is to have a level playing
field. *Montgomery v. Pinchak*, 294 F.3d 492 (3rd Cir 2002)
- Michael Lee Rose

Michael Lee Rose



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I/M Michael Lee RoseSBI# 099880 UNIT D-E-P-25

DELAWARE CORRECTIONAL CENTER

1181 W DICK ROAD

SMYRNA, DELAWARE 19977

U.S District Court
District of Delaware
844 N. King Street, Lookay 18
Wilm. Del. 19801-
3570